

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-06-056

Alcan Composites USA, Inc.

Benton, KY 42025

June 11, 2007

Rick Shewekah, Reviewer

SOURCE ID: 21-157-00027

AGENCY INTEREST #: 2916

ACTIVITY ID: APE20050001

SOURCE DESCRIPTION:

Alcan Composites USA, Inc. (Alcan), previously Alusuisse Composites, Inc., is located in Benton, Kentucky, and operates an existing facility that manufactures two (2) product types identified as Sintra and Alucobond sheets. The Sintra sheet is a rigid, foamed PVC sheet produced by combining PVC in powder form with the needed additives. Sintra production is comprised of two (2) operations: the compounding operation and the Sintra Line. The compounding operation consists of dry materials storage (PVC silos and additives stored in sacks), measuring, mixing and transfer to the Sintra line. The Sintra line consists of four (4) Sintra extruders which feed extruded sheets to a series of rollers that control the temperature and thickness of the sheets, with trimming and cutting of finished sheets occurring when the sheets are cooled to a rigid state.

Alucobond is a building material formed by bonding painted aluminum sheets to each side of an extruded polyethylene core. Alcan has two (2) production lines comprising its Alucobond manufacturing system: the paint line and the Alucobond line. The paint line consists of aluminum coil unwind, two-sided paint roll coating of the unwound aluminum sheet, sheet feed through the drying oven with captured organic compound emissions ducted to the existing thermal oxidizer, quenching, and coil rewind for use at the Alucobond Line. The Alucobond Line consists of dry polyethylene fed to an extruder, with the extruded sheets combined with (i.e., placed between) two unwound aluminum sheets using heated rollers, and cutting of finished sheets.

PUBLIC AND U.S. EPA REVIEW:

On May 2, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *Paducah Sun* in Paducah, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Alcan Composites USA, Inc. on May 21, 2007. Attachment B to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

Response to Comments

Comments on Alcan Composites USA, Inc.'s Architectural Sheet and Plastic Sheet Manufacturing facility Draft Conditional major Air Quality Permit submitted by Russell K. Vail, Manager, Environmental, Health and Safety.

Conditional Major Permit

1. It is our understanding that in Condition 3b of Emission Point 01, the Initial Compliance Test was done on April 27, 2000 and therefore, no further stack testing is required at this time.

Division's response: Testing as required in 3.b is to be performed within 180 days of issuance of this permit and at least once every five (5) years from the date of the prior valid compliance testing demonstration. Conditions 3.b and 5.b of the permit have been modified to reflect this change.

2. Also, it is our understanding that "the Administrator" is clarified to be the Director of the Kentucky Division of Air Quality since the NSPS 40 CFR 60 subpart TT has been delegated to the Commonwealth of Kentucky.

Division's response: As defined in 40 CFR 60.2 (Subpart A), "Administrator means the Administrator of the Environmental Protective Agency or his authorized representative." Consistent with this definition, 401 KAR 60:005, Section 1(1), defines "administrator" to be the Secretary of the Environmental and Public Protection Cabinet unless a specific provision of the applicable NSPS (40 CFR Part 60, Subpart TT in this case) states that the U.S. EPA retains enforcement authority. Since the applicable requirements of Subpart TT as incorporated into this permit make no such statement, "administrator" as referenced in Section B to EP01 does refer to the Director as noted by the commenter. This response is a point of clarification and there is no change due to this comment.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.